IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

BESANG, INC.,

Plaintiff

Case No. 2:23-CV-00028-JRG-RSP

v.

MICRON TECHNOLOGY, INC., MICRON SEMICONDUCTOR PRODUCTS, INC., and MICRON TECHNOLOGY TEXAS, LLC,

Defendants.

JURY TRIAL DEMANDED

JOINT MOTION TO AMEND THE DOCKET CONTROL ORDER

Plaintiff BeSang, Inc. ("Plaintiff") and Defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas, LLC, ("Defendants") respectfully move to amend the Docket Control Order (Dkt. No. 48) to extend the deadline to file the proposed protective order by seven days:

Original Deadline	New Deadline	Event
June 20, 2023	June 27, 2023	*File Proposed Protective Order
		The Proposed Protective Order shall be filed as a separate motion with the caption indicating whether or not the proposed order is opposed in any part.

The Parties have been diligently meeting and conferring to negotiate and reach agreement on the proposed protective order. So far, these conferences have been productive and have resulted in the successful narrowing of disputes. However, the Parties request more time to continue these negotiations to attempt to further narrow remaining disputes and finalize language on narrowed disputes. This motion is not made for purposes of delay, will not prejudice any party, and will not interfere with any other deadline in this case.

WHEREFORE, Plaintiff and Defendants respectfully request the Court grant this Joint Motion and extend the deadline for the Parties to submit a proposed protective order by seven days, up to and including June 27, 2023.

Dated: June 20, 2023 Respectfully submitted,

/s/ Warren J. McCarty III

Bradley W. Caldwell

Texas State Bar No. 24040630

Email: bcaldwell@caldwellcc.com

Jason D. Cassady

Texas State Bar No. 24045625

Email: jcassady@caldwellcc.com

John Austin Curry

Texas State Bar No. 24059636

Email: acurry@caldwellcc.com

Warren J. McCarty, III

Texas State Bar No. 24107857

Email: wmccarty@caldwellcc.com

R. Seth Reich Jr.

Texas State Bar No. 24088283

Email: sreich@caldwellcc.com

Xu Zhou

Texas State Bar No. 24121219

xzhou@caldwellcc.com

Bjorn A. Blomquist

Texas State Bar No. 24125125

bblomquist@caldwellcc.com

James F. Smith

Texas State Bar No. 24129800

jsmith@caldwellcc.com

CALDWELL CASSADY & CURRY P.C.

2121 N Pearl Street, Suite 1200

Dallas, TX 75201

Telephone: (214) 888-4848 Facsimile: (214) 888-4849

Deron R. Dacus
State Bar No. 00790553 **The Dacus Firm, P.C.**821 ESE Loop 323, Suite 430
Tyler, TX 75701
Phone: (903) 705-1117
Fax: (903) 581-2543
ddacus@dacusfirm.com

ATTORNEYS FOR PLAINTIFF, BESANG, INC.

Melissa R. Smith (TX #24001351) melissa@gillamsmithlaw.com GILLAM & SMITH, LLP 303 South Washington Avenue Marshall, Texas 75670 Telephone: (903) 934-8450 Facsimile: (903) 934-9257

John Kappos (TX# 24130097) jkappos@omm.com Timothy S. Durst (TX #00786924) tdurst@omm.com Cason G. Cole (TX#24109741) ccole@omm.com Frances Mackay (TX#24109494) fmackay@omm.com

O'MELVENY & MYERS LLP

2501 North Harwood Street, Suite 1700

Dallas, TX 75201

Telephone: (972) 360-1900 Facsimile: (972) 360-1901

Xin-Yi Zhou (TX# 24127916) vzhou@omm.com

O'MELVENY & MYERS LLP

400 South Hope Street, 18th Floor Los Angeles, CA 90071 Telephone: (213) 430-6000 Facsimile: (213) 430-6407

William M. Fink (admitted pro hac vice)

tfink@omm.com
Patric Reinbold (admitted pro hac vice)
preinbold@omm.com
O'MELVENY & MYERS LLP
1625 Eye Street, NW
Workington, DC 20006

Washington, DC 20006 Telephone: (202) 383-5300 Facsimile: (202) 383-5414

Attorneys for Defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas, LLC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 20th day of June 2023.

/s/ Warren J. McCarty III
Warren J. McCarty III

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendants met and conferred with counsel for Plaintiff. The Parties are jointly seeking the relief requested herein.

/s/ Warren J. McCarty III
Warren J. McCarty III